



VIA ECF

September 20, 2018

Honorable Frederic Block, U.S.D.J.
United States District Court for Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

**RE: Sabrina Thomas v. ECD NY Inc., et al
Case No. 17-cv-06139-FB-VMS
Monique Thomas v. ECD NY Inc., et al
Case No. 18-cv-00467-FB- VMS
Zakeya Frasier v. ECD NY Inc., et al.
Case No. 18-cv-04468-FB-VMS**

Dear Judge Frederic Block:

I represent Plaintiffs, Sabrina Thomas, Monique Thomas, and Zakeya Frasier, (hereinafter, "S. Thomas," "M. Thomas" and "Z. Frasier" or "Plaintiffs") in the above captioned matters. I write to respectfully request that the Court issue an Order for the parties to attend a joint mediation. Additionally, in the alternative, granting Plaintiff an extension to oppose Defendants' motion to dismiss or otherwise file an Amended Complaint until October 12, 2018.

At the initial conference held on August 27, 2018, the parties discussed with Magistrate Judge Vera M. Scanlon, reassigning the District Judges and Magistrate Judges in M. Thomas and Z. Frasier, and the parties attending a joint mediation. Defendants' counsel expressed an interest at the conference but Plaintiff's counsel was unable to give authority for all three Plaintiffs at that time. Since then, M. Thomas and Z. Frasier were reassigned to your Honor, but the deadlines in each case did not change which made Plaintiff, S. Thomas Opposition to Defendants' motion to dismiss, M. Thomas Complaint and Z. Frasier Complaint, due on September 21, 2018. Plaintiff's counsel has received consent on behalf of all three Plaintiffs to attend joint mediation with Defendants.

Accordingly, I respectfully request that the Court issue an Order assigning the parties to a joint mediation and adjourning the due dates in each case until after said mediation or until the parties have had an opportunity to discuss this matter further with the Court. Otherwise we respectfully request an extension to amend the Complaint until October 12, 2018 and to file Plaintiff M. Thomas and Z. Frasier Complaint to October 5, 2018.

We thank the Court for its time and consideration in this matter.

Respectfully submitted,

Melissa Mendoza, Esq.

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760
Philadelphia Office: 1845 Walnut Street, Suite 1600, Philadelphia, PA 19103 | (215) 391-4790
Miami Office: 100 SE 2nd Street, Suite 2000, Miami, FL 33131 | (305) 946-1884
New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625
Website: www.discriminationandsexualharassmentlawyers.com

cc: Michael R. Wood, Esq. (Counsel for Defendants)